

**IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,)
)
)
Plaintiff,)
)
vs.) **Case No.: 14-CR-2783 JB**
)
)
THOMAS R. RODELLA and)
THOMAS R. RODELLA, JR.)
)
Defendant.)

**REQUEST FOR JURY TO BE DRAWN
FROM NORTHERN NEW MEXICO JURY PANEL**

The Defendant, Thomas R. Rodella, by and through his counsel of record, Robert J. Gorence and Louren Oliveros of Gorence & Oliveros, P.C., requests that the Court draw the jury for the trial in this matter, set for the week of September 22, 2014, from the Northern Division jury panel. In support of this Request, Mr. Rodella states as follows:

Counsel for Mr. Rodella has learned that a courtroom is unavailable the week of September 22, 2014 at the Santiago E. Campos United States Courthouse in Santa Fe, New Mexico.

Nonetheless, Defendant Rodella requests that his jury be selected from a Northern New Mexico jury panel. In New Mexico, three petit jury divisions have been established. *See NM R USDCT Jury Plan, § 2.* Each petit jury division is sectored into specific counties. *Id.* The Northern Division includes the following: Colfax, Curry, De Baca, Guadalupe, Harding, Los Alamos, Mora, Quay, Rio Arriba, San Miguel, Santa Fe, Taos, Roosevelt, and Union Counties. *Id.* at § 2(a)(1).

The underlying events of the instant case took place in Rio Arriba County, and Defendant Rodella requests a jury of his peers to come from the Northern Division jury panel.

Any potential inconvenience encumbered by jurors traveling long distances can be alleviated in this case by providing per diem and accommodations. Even jurors from Clayton, New Mexico and Farmington, New Mexico drawn from a Northern New Mexico jury panel are provided with accommodations and per diem, so any inconvenience would be minimal.

WHEREFORE, for the above mentioned reasons, Defendant Rodella requests that this Court select the jury panel for the trial in this case, set to take place during the week of September 22, 2014, from the Northern Division jury panel as established by the District of New Mexico Jury Selection Plan.

Respectfully submitted,

/s/ Robert J. Gorence
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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing pleading was emailed to counsel of record by CM/ECF this 5th day of September, 2014.

/s/ Robert J. Gorence
Robert J. Gorence